

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
N.D. Cal. No. 23-cv-06708
D. Ariz. No. 25-cv-4276

**DECLARATION OF STEVEN D. COHN IN
SUPPORT OF ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE FILED UNDER SEAL**

I, Steven D. Cohn, declare:

1. I am a partner of Chaffin Luhana, LLP, an attorney licensed in the State of New York, and duly admitted to practice before this Court *pro hac vice*, representing Plaintiffs in the above caption action. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. Because the materials at issue were designated by Uber as "CONFIDENTIAL" and/or "HIGHLY CONFIDENTIAL", Plaintiff filed the following under seal:

Document	Description	Designating Party
Portions of Plaintiff's Response in Opposition to Defendants' Motions in Limine	Portions of briefing referring to documents and testimony designated highly confidential and confidential	Uber
Exhibit 2	UBER JCCP MDL 000337623	Uber
Exhibit 3	UBER JCCP MDL 000475307	Uber
Exhibit 4	UBER JCCP MDL 001717430	Uber
Exhibit 5	UBER JCCP MDL 000118664	Uber
Exhibit 6	UBER JCCP MDL 002010063	Uber
Exhibit 7	UBER JCCP MDL 001319387	Uber

Document	Description	Designating Party
Exhibit 8	Screenshots of video exhibits 1015 and 1016, Heather Childs Deposition June 5, 2025	Uber
Exhibit 9	Andrew Hasbun Deposition Transcript, April 10, 2025	Uber
Exhibit 10	Brooke Anderson Deposition Transcript, May 2, 2025	Uber
Exhibit 11	Hannah Nilles Deposition Transcript, August 7, 2025	Uber
Exhibit 12	UBER JCCP MDL 000562614	Uber
Exhibit 13	UBER JCCP MDL 001441325	Uber
Exhibit 14	UBER JCCP MDL 003340515	Uber
Exhibit 15	UBER JCCP MDL 000890205	Uber
Exhibit 16	UBER000205949	Uber
Exhibit 17	UBER JCCP MDL 005031659	Uber
Exhibit 18	Valerie Shuping Deposition Transcript, April 18, 2025	Uber
Exhibit 19	UBER JCCP MDL 003231342	Uber
Exhibit 20	UBER JCCP MDL 001701663	Uber
Exhibit 21	UBER JCCP MDL 000122017	Uber
Exhibit 22	Todd Gaddis Deposition Transcript, July 8, 2025	Uber
Exhibit 23	UBER JCCP MDL 000108957	Uber
Exhibit 24	UBER JCCP MDL 003922272	Uber
Exhibit 25	UBER JCCP MDL 000484014	Uber
Exhibit 26	Dara Khosrowshahi Deposition Transcript, July 1, 2025	Uber
Exhibit 27	Roger Kaiser Deposition Transcript, April 22, 2025	Uber
Exhibit 28	UBER JCCP MDL 001732337	Uber
Exhibit 29	UBER JCCP MDL 001636209	Uber
Exhibit 30	UBER JCCP MDL 000898569	Uber
Exhibit 31	Rebecca Payne Deposition Transcript, May 13, 2025	Uber
Exhibit 33	Travis Kalanick Deposition Transcript, July 3, 2025	Uber
Exhibit 34	UBER JCCP MDL 004753672	Uber
Exhibit 35	UBER JCCP MDL 001711889	Uber
Exhibit 36	UBER JCCP MDL 003441012	Uber
Exhibit 37	UBER JCCP MDL 000564141	Uber
Exhibit 38	UBER JCCP MDL 004216886	Uber
Exhibit 39	UBER JCCP MDL 001563463	Uber
Exhibit 40	UBER JCCP MDL 001739193	Uber
Exhibit 41	UBER JCCP MDL 001100749	Uber
Exhibit 42	UBER JCCP MDL 001072809	Uber
Exhibit 43	UBER JCCP MDL 000031164	Uber
Exhibit 44	UBER JCCP MDL 001773711	Uber
Exhibit 45	UBER JCCP MDL 000084521	Uber
Exhibit 46	UBER JCCP MDL 004752785	Uber
Exhibit 47	UBER JCCP MDL 003040649	Uber
Exhibit 48	Declaration of Todd Gaddis, August 18, 2025	Uber
Exhibit 49	Incident Report Field Convenience Descriptions, March 24, 2025	Uber

Document	Description	Designating Party
Exhibit 50	Defendants' Responses to Plaintiffs' Interrogatories and Requests for Production, August 18, 2025	Uber
Exhibit 51	Katherine McDonald Deposition Transcript, October 7, 2024	Uber
Exhibit 52	Hannah Nilles Deposition Transcript, July 10, 2025	Uber
Exhibit 53	Sunny Wong Deposition Transcript, October 14, 2025	Uber
Exhibit 54	UBER-MDL3084-DFS00159600	Uber
Exhibit 55	UBER-MDL3084-DFS00003713	Uber
Exhibit 56	Transcript of Audio, UBER-MDL3084-DFS00159677	Uber
Exhibit 57	UBER-MDL3084-DFS00003692	Uber
Exhibit 58	Transcript of Audio, UBER-MDL3084-DFS00003741	Uber

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 30, 2025 in Hoboken, New Jersey.

/s/ Steven D. Cohn

Steven D. Cohn